

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

In re: Application Pursuant to)	
28 U.S.C. 1782 of)	
)	
FARHAD AZIMA)	Case No.: 22-20707-MC-MARTINEZ
)	
Petitioner,)	
v.)	
)	
INSIGHT ANALYSIS AND RESEARCH,)	
LLC, and SDC-GADOT LLC,)	
)	
Respondents,)	
)	
)	

**NOTICE OF SERVICE OF RESPONDENT, SDC-GADOT, LLC'S RESPONSE TO
PETITIONER'S SUBPOENA FOR PRODUCTION OF DOCUMENTS DATED
MARCH 11, 2022**

Respondent, SDC-GADOT, LLC, hereby provides Notice of the Service of its responses to
Petitioner's Subpoena for Production of Documents dated March 11, 2022, on this 14th day of June,
2022, in the form as follows in the attachment hereto.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 14th day of June, 2022, that a true and correct
copy of the foregoing has been filed through the Court's CM/ECF-filing portal and that a true copy
has been served through the portal upon all counsel of record in this action.

Respectfully submitted,

By: /s/ Christopher S. Salivar, Esq.
Christopher S. Salivar, Esquire
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By: /s/ Elan I. Baret, Esq.

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**SDC-GADOT, LLC'S RESPONSE TO PETITIONER'S SUBPOENA FOR PRODUCTION
OF DOCUMENTS DATED MARCH 11, 2022**

Respondent, SDC-GADOT, LLC, hereby responds to the Subpoena issued by counsel for the Petitioner and dated March 11, 2022, as served upon the Respondent, as follows:

1. All documents and communications from February 2015 to present relating to or reflecting any work performed by you, Mr. Amit Forlit, and/or Mr. Stuart Page relating directly or indirectly to Mr. Farhad Azima or Azima's Associates, including but not limited to:
 - a. All reports prepared about Mr. Azima and/or Azima's Associates;
 - b. All documents from Mr. Azima or Azima's Associates, whether or not it was included in a report;
 - c. All engagement letters relating to Mr. Azima or the Project;
 - d. All invoices for the Project, including but not limited to invoices sent to Page Group ME Ltd and any other Page Group entity;
 - e. All communications regarding Mr. Azima or Azima's Associates; and
 - f. All communications about any websites, torrent, or WeTransfer links relating to Mr. Azima.

RESPONSE: None other than those documents filed of record with the Court in this proceeding as Exhibits to Petitioner's filings, and the filings of Respondents and/or non-party Amit Forlit.

2. All documents and communications from January 2018 to present relating to Mr. Azima's trial and/or attempts to mislead or a conspiracy to mislead the UK court about the discovery of the hacked data, including but not limited to:

- a. All communications with Mr. Neil Gerrard, Mr. David Hughes, Mr. Jamie Buchanan, Mr. Amit Forlit, Mr. Majdi Halabi, Mr. Stuart Page, Dechert, or Stewarts Law;
- b. All documents and communications regarding meetings between or among you and/or any of the conspirators, including at the Hotel Mooseegg in Switzerland, any hotel in Cyprus, or any office(s) of Dechert; and
- c. All travel records reflecting trips to Switzerland, Cyprus, or England.

RESPONSE: None other than those documents filed of record with the Court in this proceeding as Exhibits to Petitioner's filings, and the filings of Respondents and/or non-party Amit Forlit.

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LLC, and SDC-GADOT LLC,)	
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Respondents,)	
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**NOTICE OF SERVICE OF RESPONDENT, INSIGHT ANALYSIS AND RESEARCH, LLC'S
RESPONSE TO PETITIONER'S SUBPOENA FOR PRODUCTION OF DOCUMENTS
DATED MARCH 11, 2022**

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Respectfully submitted,

By: /s/ Christopher S. Salivar, Esq.
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**INSIGHT ANALYSIS AND RESEARCH, LLC'S RESPONSE TO PETITIONER'S
SUBPOENA FOR PRODUCTION OF DOCUMENTS DATED MARCH 11, 2022**

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 - a. All reports prepared about Mr. Azima and/or Azima's Associates;
 - b. All documents from Mr. Azima or Azima's Associates, whether or not it was included in a report;
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